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Attorney for Defendant Jeffers Crane Service, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THOMAS H. PILLSBURY, JR. and MELODY
PILLSBURY,

Plaintiffs,

v.

PBF ENERGY, INC., and JEFFERS CRANE
SERVICE, INC.,

Defendants.

Case No. 2:20-cv-09301-MCA-LDW

JUDGE MADELINE COX ARLEO

**DEFENDANT JEFFERS CRANE
SERVICE, INC.'S MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendant Jeffers Crane Service, Inc. ("Jeffers"), shall move this Court on September 8, 2020 to dismiss Plaintiffs' Complaint for lack of personal jurisdiction on the grounds that Jeffers is not subject to general jurisdiction in New Jersey and specific jurisdiction is lacking because Plaintiffs' claims do not arise from or relate to Jeffers's activities in New Jersey. A Memorandum in support of this Motion is attached.

Respectfully submitted,

/s/ Riccardo M. DeBari

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Of Counsel:

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